

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
GT Real Estate Holdings, LLC,)	
Debtor. ¹)	Case No. 22-10505 (KBO)
)	
GT Real Estate Holdings, LLC,)	
Plaintiff,)	
v.)	Adv. Pro. No. 22-50391 (KBO)
York County, South Carolina,)	
Defendant.)	
)	

**NOTICE OF *SECOND* AMENDED² AGENDA OF MATTERS SCHEDULED FOR
HEARING ON SEPTEMBER 19, 2022 AT 9:00 A.M. (EASTERN)**

THE HEARING WILL BE IN-PERSON. PURSUANT TO THE COURT'S PROCEDURES, ZOOM CREDENTIALS ARE BEING PROVIDED FOR CERTAIN OBSERVERS AND REQUIRES ALL SUCH INDIVIDUALS TO REGISTER IN ADVANCE. COURTCALL WILL NOT BE USED TO DIAL IN.

PLEASE USE THE FOLLOWING LINK TO REGISTER FOR THE HEARING:

<https://debuscourts.zoomgov.com/meeting/register/vJlSdO-prjosEpIXUIS2y1bzOB1pEYmrrh4>

PLEASE NOTE: THE COURT REQUESTS THAT INDIVIDUALS REGISTER WITH ZOOM NO LATER THAN 2 HOURS PRIOR TO THE START OF THE HEARING

ONCE REGISTERED, INDIVIDUALS WILL RECEIVE A CONFIRMATION EMAIL CONTAINING PERSONAL LOG-IN INFORMATION FOR THE HEARING.

¹ The Debtor and the last four digits of its taxpayer identification number are: GT Real Estate Holdings, LLC (9589). The location of the Debtor's principal office is 800 South Mint Street, Charlotte, NC 28202.

² **Amended/Added agenda items are noted in bold.**

I. MATTERS GOING FORWARD

1. Debtor's Motion for Entry of an Order (I) Approving (A) the Plan Support and Sponsorship Agreement, (B) the Disclosure Statement and Form and Manner of Notice Thereof, (C) the Plan Solicitation and Voting Procedures, (D) the Forms of Ballots and Notices Related to the Plan and Confirmation Hearing, and (E) the Confirmation Timeline and (II) Granting Related Relief [[D.I. 297](#)] (Date Filed: August 11, 2022)

Objection/Response Deadline: September 12, 2022 at 4:00 p.m. (ET)

Objections/Responses Received:

- a. J. Mitchell Aberman's Reservation of Rights to the (I) Chapter 11 Plan of Reorganization of GT Real Estate Holdings, LLC, and (II) Disclosure Statement for the Chapter 11 Plan of Reorganization of GT Real Estate Holdings, LLC [[D.I. 367](#)] (Date Filed: September 11, 2022)
- b. Limited Objection and Reservation of Rights of York County, South Carolina to the Debtor's Disclosure Statement for the Chapter 11 Plan of Reorganization of GT Real Estate Holdings, LLC [[D.I. 368](#)] (Date Filed: September 12, 2022)
- c. United States Trustee's Objection to the Debtor's Motion for Entry of an Order (I) Approving (A) the Plan Support and Sponsorship Agreement, (B) the Disclosure Statement and Form and Manner of Notice Thereof, (C) the Plan Solicitation and Voting Procedures, (D) the Forms of Ballots and Notices Related to the Plan and Confirmation Hearing, and (E) the Confirmation Timeline and (II) Granting Related Relief [[D.I. 369](#)] (Date Filed: September 12, 2022)
- d. Reservation of Rights as to Disclosure Statement [[D.I. 371](#)] (Date Filed: September 13, 2022)
- e. The City of Rock Hill's Limited Objection to the Debtor's Motion for Approval of the Disclosure Statement [[D.I. 373](#)] (Date Filed: September 13, 2022)

Related Documents:

- f. Chapter 11 Plan of Reorganization of GT Real Estate Holdings, LLC [[D.I. 295](#)] (Date Filed: August 11, 2022)
- g. Disclosure Statement for the Chapter 11 Plan of Reorganization of GT Real Estate Holdings, LLC [[D.I. 296](#)] (Date Filed: August 11, 2022)
- h. Chapter 11 Plan of Reorganization of GT Real Estate Holdings, LLC [[D.I. 375](#)] (Date Filed: September 13, 2022)
- i. Disclosure Statement for the Chapter 11 Plan of Reorganization of GT Real Estate Holdings, LLC [[D.I. 376](#)] (Date Filed: September 13, 2022)

- j. Notice of Filing of Redlines of Modified Plan and Disclosure Statement [[D.I. 377](#)] (Date Filed: September 13, 2022)
- k. Debtor's Omnibus Reply in Support of Debtor's Motion for Entry of an Order (I) Approving (A) the Plan Support and Sponsorship Agreement, (B) the Disclosure Statement and Form and Manner of Notice Thereof, (C) the Plan Solicitation and Voting Procedures, (D) the Forms of Ballots and Notices Related to the Plan and Confirmation Hearing, and (E) the Confirmation Timeline and (II) Granting Related Relief [[D.I. 389](#)] (Date Filed: September 15, 2022)
- l. Disclosure Statement for the Chapter 11 Plan of Reorganization of GT Real Estate Holdings, LLC [[D.I. 391](#)] (Date Filed: September 16, 2022)
- m. Chapter 11 Plan of Reorganization of GT Real Estate Holdings, LLC [[D.I. 392](#)] (Date Filed: September 16, 2022)
- n. Supplement to Debtor's Motion for Entry of an Order (I) Approving (A) the Plan Support and Sponsorship Agreement, (B) the Disclosure Statement and Form and Manner of Notice Thereof, (C) the Plan Solicitation and Voting Procedures, (D) the Forms of Ballots and Notices Related to the Plan and Confirmation Hearing, and (E) the Confirmation Timeline and (II) Granting Related Relief [[D.I. 393](#)] (Date Filed: September 16, 2022)
- o. Notice of Filing of Redlines of Modified Plan and Disclosure Statement [[D.I. 394](#)] (Date Filed: September 16, 2022)

Status: The hearing on this matter will go forward.

II. MATERS IN THE ADVERSARY PROCEEDING

- 2. Defendant York County, South Carolina's Motion to Quash Notice of Rule 30(b)(6) Deposition [[Adv. D.I. 28](#)] (Date Filed: September 1, 2022)

Objection/Response Deadline: September 17, 2022 at 4:00 p.m. (ET)

Objections/Responses Received:

- a. Debtor's Objection to York County's Motion to Quash Notice of Rule 30(b)(6) Deposition [[Adv. D.I. 34](#)] (Date Filed: September 13, 2022)

Related Documents:

- b. N/A

Status: The hearing on this matter will go forward.

- 3. Debtor's Motion for Entry of an Order Authorizing Debtor to File Under Seal (A) Debtor's Reply Brief in Support of, Debtor's Motion for an Order (I) Preliminarily

Enjoining the State Court Action and (II) Granting Related Relief and (B) the Supporting Declarations Thereto and (II) Granting Related Relief [[Adv. D.I. 14](#)] (Date Filed: August 29, 2022)

Objection/Response Deadline: September 12, 2022 at 4:00 p.m. (ET)

Objections/Responses Received:

- a. [SEALED] Defendant York County, South Carolina's Partial Objection to Debtor's Motion for Entry of an Order Authorizing Debtor to File Under Seal (A) Debtor's Reply Brief in Support of, Debtor's Motion for an Order (I) Preliminarily Enjoining the State Court Action and (II) Granting Related Relief and (B) the Supporting Declarations Thereto and (II) Granting Related Relief [[Adv. D.I. 29](#)] (Date Filed: September 1, 2022)

Related Documents:

- b. [SEALED] Reply in Support of Debtor's Motion for Entry of an Order Authorizing Debtor to File Under Seal (A) Debtor's Reply Brief in Support of, Debtor's Motion for an Order (I) Preliminarily Enjoining the State Court Action and (II) Granting Related Relief and (B) the Supporting Declarations Thereto and (II) Granting Related Relief [[Adv. D.I. 35](#)] (Date Filed: September 13, 2022)

Status: The hearing on this matter will go forward.

4. Pretrial/Scheduling Conference

Related Documents:

- a. Debtor's Verified Complaint for Declaratory Judgment and Injunctive Relief [[Adv. D.I. 1](#)] (Date Filed: July 14, 2022)
- b. Answer to Complaint and Assertion of Counterclaims to Debtor's Verified Complaint for Declaratory Judgment and Injunctive Relief [[Adv. D.I. 25](#)] (Date Filed: August 30, 2022)
- c. Notice of Adjournment [[Adv. D.I. 31](#)] (Date Filed: September 1, 2022)
- d. **Debtor's Amended Verified Complaint for Declaratory Judgment and Injunctive Relief [[Adv D.I. 38](#)] (Date Filed: September 14, 2022)**
- e. **Plaintiff's Proposed First Case Management Plan and Scheduling Order [[Adv. D.I. 43](#)] (Date Filed: September 16, 2022)**

Status: The pretrial/scheduling conference will go forward.

III.RESOLVED MATTERS

- 5. The City of Rock Hill’s Emergency Motion for Entry of An Order (I) Adjourning the Hearing to Approve Disclosure Statement Set for September 19, 2022; (II) Extending the City of Rock Hill’s Objection Deadline; and (III) Granting Related Relief [D.I. 387] (Date Filed: September 15, 2022)**

Objection/Response Deadline: N/A

Objections/Responses Received:

- a. Debtor’s Objection to (A) The City of Rock Hill’s Emergency Motion for Entry of An Order (I) Adjourning the Hearing to Approve Disclosure Statement Set for September 19, 2022; (II) Extending the City of Rock Hill’s Objection Deadline; and (III) Granting Related Relief and (B) Motion to Shorten Time for The City of Rock Hill’s Emergency Motion for Entry of An Order (I) Adjourning the Hearing to Approve Disclosure Statement Set for September 19, 2022; (II) Extending the City of Rock Hill’s Objection Deadline; and (III) Granting Related Relief [D.I. 390] (Date Filed: September 15, 2022)**

Related Documents:

- b. Motion to Shorten Time for The City of Rock Hill’s Emergency Motion for Entry of An Order (I) Adjourning the Hearing to Approve Disclosure Statement Set for September 19, 2022; (II) Extending the City of Rock Hill’s Objection Deadline; and (III) Granting Related Relief [D.I. 388] (Date Filed: September 15, 2022)**
- c. Order Regarding The City of Rock Hill’s Emergency Motion for Entry of An Order (I) Adjourning the Hearing to Approve Disclosure Statement Set for September 19, 2022; (II) Extending the City of Rock Hill’s Objection Deadline; and (III) Granting Related Relief [D.I. 398] (Date Filed: September 16, 2022)**

Status: The Court entered an Order (*see* D.I. 398).

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Dated: September 17, 2022

Respectfully submitted,

FARNAN LLP

/s/ Michael J. Farnan

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